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15 *Ultimate Fighting Championship and UFC*

16
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.
26
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF
DEFENDANT ZUFFA, LLC'S REPLY
IN SUPPORT OF ITS MOTION TO
SEAL ZUFFA'S REPLY IN SUPPORT
OF ZUFFA'S MOTION FOR
SUMMARY JUDGMENT (ECF NO.
614)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa’s Reply in Support of its Motion to Seal
8 Zuffa’s Reply in Support of Its Motion for Summary Judgment (ECF No. 614) (“Reply in Support of
9 Motion to Seal”). Based on my personal experience, knowledge, and review of the files, records, and
10 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,
11 if called to testify, could and would testify competently to those facts under oath.

12 3. Exhibit A to this declaration is a true and correct copy of an article written by Paul
13 Gift, titled *UFC Lawsuit: Plaintiffs Oppose Summary Judgment, Make Final Pitch For Trial*, from
14 Forbes.com, dated September 24, 2018, and available at
15 [https://www.forbes.com/sites/paulgift/2018/09/24/ufc-antitrust-lawsuit-plaintiffs-oppose-summary-](https://www.forbes.com/sites/paulgift/2018/09/24/ufc-antitrust-lawsuit-plaintiffs-oppose-summary-judgment-pitch-trial-mma-news/#56863e381ba7)
16 [judgment-pitch-trial-mma-news/#56863e381ba7](https://www.forbes.com/sites/paulgift/2018/09/24/ufc-antitrust-lawsuit-plaintiffs-oppose-summary-judgment-pitch-trial-mma-news/#56863e381ba7).

17 4. Exhibit B to this declaration is a true and correct copy of a tweet posted by John S.
18 Nash (@heynottheface) on Twitter, dated October 3rd, 2018 at 5:12 PM, and available at
19 <https://twitter.com/heynottheface/status/1047640574931623936>.

20 5. Exhibit C to this declaration is a true and correct copy of a tweet posted by Paul Gift
21 (@MMAanalytics) on Twitter, dated October 3rd, 2018 at 7:08 PM, and available at
22 <https://twitter.com/MMAanalytics/status/1047669638933311488>.

23 6. Exhibit D to this declaration is a true and correct copy of a tweet posted by Paul Gift
24 (@MMAanalytics) on Twitter, dated November 2, 2018 at 10:55 PM, and available at
25 <https://twitter.com/MMAanalytics/status/1058598586793914369>.

26 7. Exhibit E to this declaration is a true and correct copy of a tweet posted by Paul Gift
27 (@MMAanalytics) on Twitter, dated November 3rd, 2018 at 1:43 AM, and available at
28 <https://twitter.com/MMAanalytics/status/1058640837347692544>.

8. Exhibit F to this declaration is a true and correct copy of a tweet posted by Paul Gift (@MMAanalytics) on Twitter, dated November 3rd, 2018 at 2:20 AM, and available at <https://twitter.com/MMAanalytics/status/1058650223990386688>.

9. Exhibit G to this declaration is a true and correct copy of an article written by Jason Cruz, titled *Zuffa Reply Brief in support of dismissing antitrust lawsuit takes aim at Plaintiffs' claims*, from MMA Payout.com, dated November 5, 2018, and available at <http://mmapayout.com/2018/11/zuffa-reply-brief-in-support-of-dismissing-antitrust-lawsuit-takes-aim-at-plaintiffs-claims/>.

10. Exhibit H to this declaration is a true and correct copy of an article written by Paul Gift, titled *UFC: Plaintiffs Pivoted Due To A “Lack of Evidence”*, from Forbes.com, dated November 7, 2018, and available at <https://www.forbes.com/sites/paulgift/2018/11/07/ufc-plaintiffs-pivoted-due-to-a-lack-of-evidence/#166762803f98>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 23rd day of November, 2018 in Washington, DC.

/s/ Stacey K. Grigsby
Stacey K. Grigsby